

FILED

MAY 23 2005

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA**

TERESA L. DEPPNER, CLERK
U.S. District & Bankruptcy Courts
Southern District of West Virginia

Kevin Ryan Frontier J.R.

#1117500

(Enter above the full name of the plaintiff
or plaintiffs in this action).

(Inmate Reg.# of each Plaintiff)

VERSUS

CIVIL ACTION NO. 2:05-0434
(Number to be assigned by Court)

Jermy Detrick

Steve Conterberry

and all "John Doss" to be

named at a later date

(Enter above the full name of the defendant
or defendants in this action).

COMPLAINT

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court
dealing with the same facts involved in this action or
otherwise relating to your imprisonment?

Yes _____ No ✓

- B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county):

3. Docket Number: _____

4. Name of judge to whom case was assigned:

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. Place of Present Confinement: Potomac Highlands Regional Jail

A. Is there a prisoner grievance procedure in this institution?

Yes ✓

No

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ✓

No

C. If your answer is YES:

1. What steps did you take? I filed a grievance form stating
that the overcrowding and conditions of the facility
were unacceptable
2. What was the result? I was told it was out of their control

there weren't enough beds available and the D.O.C
would not accept me

D. If your answer is NO, explain why not: _____

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Kevin Ray Fowler J.R. #1117500

Address: Potomac Highlands Regional Jail, 13 Dolan Dr. Appalachia, W.V.
26704

B. Additional Plaintiffs and Address: _____

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

- C. Defendant Jerry Detrick
is employed as Administrator
at Potomac Highlands Regional Jail, 13 Doka Drive Augusta, W.V. 26704
- D. Additional defendants: Steve Canterbury, Executive Director of
the West Virginia Regional Jail Authority, 1900 Kanawha
Blvd., Charleston, W.V. 25305 and any other "John Does"
to be named at a later time

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheet if necessary).

I have been incarcerated at the dangerous, and
very overpopulated regional jail system for over two years
sleeping on the floor of a single occupancy cell in a
16 man dorm with 20 or more inmates making the
regional jail system dangerous, and very overpopulated which
in turn creates problems, tension, arguments, and fights between

IV. Statement of Claim (continued):

inmates, and the inmates being wrote up for the problems being caused by the extreme overpopulation and inhumane treatment we recieve in the regional jail system which is in violation of my civil rights, civil liberties, state laws, and federal laws.

V. RELIEF

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I seek the sum of one million dollars (\$1,000,000.00) for pain, and suffering, in addition I also seek the additional sum of one million dollars (\$1,000,000.00) for punitive damages, furthermore, I seek relief, and release from the conditions of my confinement.

V. Relief (continued)

VII. Counsel

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

Age Group	Percentage
18-24	10%
25-34	20%
35-44	25%
45-54	20%
55-64	15%
65-74	10%
75-84	5%
85+	5%

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?**

Yes ☒ No ☐

If so, state the name(s) and address(es) of each lawyer contacted:

Craig Mansford, P.O. Box 5021, Martinsburg, W.V. 25401

If not, state your reasons: _____

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes No ☒

If so, state the lawyer's name and address:

Signed this 10th day of May, 2005

Kevin Ray Fowler Jr.

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct, *to the best of my knowledge and ability.*

Executed on 5-10-05
(Date)

Kevin Ray Fowler Jr.
Signature of Movant/Plaintiff

Signature of Attorney
(if any)